

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

In re:

WILLIAM FRED BONHAM

CASE NO. 6:15-bk-01152-ABB

Debtor.

CHAPTER 13

OBJECTION TO CONFIRMATION OF PLAN

Creditor, Rushmore Loan Management Services LLC as servicing agent for Christiana Trust, A Division of Wilmington Savings Fund Society, FSB, as Trustee for Stanwich Mortgage Loan Trust, Series 2013-7, objects to Debtor's Plan and states:

1. Creditor holds a secured claim by virtue of its note and mortgage on the property located at 404 Laurenburg Lane, Ocoee, Florida 34761.
2. Creditor intends to timely file a Proof of Claim ("Claim").
3. Creditor anticipates the Claim to reflect a total secured claim in the amount of \$429,420.91 along with pre-petition arrearage in the amount of \$143,251.67.
4. Debtor's Plan indicates an intention to mediate with Creditor through the Loss Mitigation Mediation Program.
5. However, as of the date of this Objection a motion for Referral to Loss Mitigation Mediation ("LMM") has not been filed.
6. Creditor has the right to inquire further into the Debtor's ability to be eligible for a loan modification either before or during the mediation process.
7. If a mediation is had and results in an impasse or denial of the modification, Creditor's claim should be paid in full or the property surrendered.
8. Moreover, Debtor's Plan should account for future taxes and insurance during the pendency

of the potential mediation.

9. Creditor reserves the right to supplement this Objection, as necessary.

WHEREFORE, Creditor respectfully requests the Court sustain its Objection and for such other and further relief as the Court deems appropriate.

Dated: March 10, 2015

/s/ Austin M. Noel
Austin M. Noel, Esquire

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served by CM/ECF notice and regular mail to the parties below this 10th day of March, 2015.

BUCKLEY MADOLE, P.C.

/s/ Austin M. Noel, Esq.
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